



CAPCOA Engineering Managers MEETING MINUTES

January 27-28, 2020

**South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765**



Monday, January 27, 2020

Part 1 – Administrative Business

1.1 Confirm Secretary / Minutes Taker: Mary Giraudo (MBARD) was confirmed as Secretary for 2020.

1.2 Introductions / Attendance List:

In Attendance:	By Phone:
Emmanuel Orozco (Chair), Placer County APCD Mitch Haimov (Vice Chair), South Coast AQMD Mary Giraudo (Secretary), Monterey Bay ARD Ali Ghasemi, Ventura County APCD Cassie Lopina, CARB Steve Brisby, CARB Roseana Brasington, Mojave Desert AQMD Lisa Beckman, EPA Sheila Tsai, EPA Amy Roberts, Sacramento Metro AQMD Paul Hensleigh, Yola-Solano AQMD Dora Drexler, San Luis Obispo County APCD Sam Oktay, Mojave Desert AQMD Guy Smith, Mojave Desert AQMD Brian Krebs, Sacramento Metro AQMD Jim Swaney, San Diego County APCD Sam Johnson, Eastern Kern APCD Amir Dejbakhsh, South Coast AQMD Jason Aspell, South Coast AQMD Bhaskar Chandan, South Coast AQMD Vicki Rausch, Antelope Valley AQMD Chris Anderson, Mojave Desert AQMD	Patrick Lucey, Butte County APCD Carol Allen, Bay Area AQMD Barry Young, Bay Area AQMD Courtney Graham, CARB Ian Ledbetter, Glenn County APCD Tina Suarez-Murias, CARB Fahmy Attar, Lake Country AQMD Jesus Ramirez, Imperial County APCD Michaela Nual, CARB Phil Chou, Mendocino County AQMD Paul Stricklin, Feather River AQMD

Mitch Haimov with SCAQMD was introduced as Vice Chair.

- 1.3 Additions / Changes to Agenda: Minor revisions to Part 2.1 of CARB updates.
- 1.4 Approve Minutes from Previous Meeting: The minutes from the October 7, 2019 meeting in Folsom were approved as submitted.
- 1.5 Schedule of Meetings for 2020 (see table below)

Date	Host	Location: Room/Address
January 27-28, 2020	South Coast AQMD	21865 Copley Dr., Diamond Bar
April 27-28, 2020	Placer County APCD	110 Maple St., Auburn, CA
August 2020	Ventura County APCD	669 County Square Dr., Ventura, CA
October 2020 (Symposium)	TBD	TBD

- 1.6 Review of Action Items: Action Items were discussed and the revised table is attached.

Part 2 – CARB Updates

- 2.1 Permit Evaluation and Support Section Updates: – Courtney Graham and Steve Brisby, CARB
 - a. SJVAPCD ERC Program Review Update- The Stationary Source Enforcement Branch has been focusing its resources on the ERC program review. The expected project time line is for the release of a draft report early February, a public workshop early March, and a final report to the Board in March 2020.
 - b. SDAPCD Review Plan (SB423) – Review is on hold until CARB completes Imperial County APCD Policy and Procedures audit and SJVAPCD ERC program review. CARB must complete the SDAPCD SB423 audit by June 2021.
 - c. Electronic Permit Submittal to CARB ([HYPERLINK "mailto:permits@arb.ca.gov"]) – Courtney reminded and encouraged everyone to use the new electronic system
 - d. Other Items – Based upon the feedback provided at the symposium, CARB will be offering two CEMS classes in 2020. Ben Segal will teach a class in northern CA in late spring, and a class in Southern CA. at a time to be determined. With the high number of retirements in recent years, CARB is collecting information from Districts to determine where stationary source documentation is being sent. CARB will be working with Districts to ensure future documents are sent to the appropriate locations.

- 2.2 Regional Haze SIP Requirements: – Christine Suarez-Murias, CARB

Christine announced that based upon 2014 data that there are 47 facilities that are impacted by the regional haze SIP requirements. The study looked at any facility within 400 kilometers within a Class I Area. The Districts with affected facilities include San Diego, Bay Area, North Coast, Mojave Desert, Amador, Santa Barbara, Shasta, South Coast, Antelope Valley, Northern Sierra, and Great Basin. CARB will be providing these districts with a list of their affected facilities. Facility types

include glass plants, biomass facilities, electric power generation, steel and mineral industries.

2.3 Draft Gasoline Service Station IW Guidelines: – Michaela Nucal, CARB

Michaela informed the group that the gasoline service station industry-wide guidelines will be separated out into 2 documents; a technical guidance document that outlines procedures for preparing emission inventories and HRAs, and a supplemental policy guidance document that outlines methods for estimating population-wide exposures. The updated draft technical guidance document will incorporate the new REL for toluene, and will include propylene which is only found in winter gasoline. The draft technical guidance document was released to the vapor recovery, CAPCOA, and TARMAC committees on January 21, 2020. CARB is requesting written comments by February 18, 2020. The draft supplemental policy document is expected to be released to the three working group committees for review in March 2020.

2.4 PSPS Workgroup Update: – Tung Le, CAPCOA

CARB released three advisories in 2019 regarding the use of back-up engines for power during PSPS events. James Goldstene (CARB) is leading a workgroup to provide two deliverables. The first deliverable is a report on the emission impacts associated with generator usage during PSPS events. Tung requested Districts review the draft calculation methodology and provide feedback to James and himself by February 10, 2020. The second deliverable is a reference document that compiles each district's permitting/compliance policies for the use of engines during PSPS events. Districts were encouraged to share and submit their policies to James and Tung.

Tung discussed SB802 which proposes to allow health facilities to use their emergency backup generator during a PSPS event without having that usage count toward any time limitation on actual usage as a condition of a permit. Tung also advised the committee of the CPUC's request for offers (RFO) for 300 MW of backup generation.

2.5 Organic Waste / Composting Workgroup Update:– Courtney Graham, CARB

Courtney announced that the January 2020 meeting to discuss the draft work plan had been cancelled. Districts expressed concern that although names had been provided to CAPCOA to participate in the composting workgroup they were unaware of such a meeting. Courtney will take this message back to Mike Ginty and May Jane Coombs in the Industrial Strategies Division to confirm workgroup members and send out email notifications.

2.6 Other Topics / Updates:

Steve Brisby (CARB) mentioned that CARB intends to conduct site inspections at MSW landfills to ensure compliance with the methane rule.

Part 3 – EPA Updates

3.1 Regulatory Updates:– Lisa Beckham, U.S. EPA

Lisa provided the following rule making and policy updates:

NSR Error Correction Rule has been adopted. There are no substantive changes to the program, just corrections to inadvertent errors that existed in the document. Districts can incorporate changes the next time they update their rule.

Revisions to the Petition Provisions of the Title V permitting program were finalized. The rule provides direction on how the public should submit petitions to EPA. The rule also clarifies that the permitting authority is required to respond in writing to significant comments, and provide that response to EPA. If comments are received, and the public comment period and the EPA 45-day review period are concurrent, then the EPA 45-day review period is restarted.

EPA has revised its policy on exclusions from “Ambient Air”. The new guidance allows for a broader interpretation, beyond a fence or other physical barrier, to determine if the general public is precluded from access to land.

EPA has issued a memo interpreting “Adjacent” for all industrial categories except for the oil and gas industry. The new interpretation relies only on proximity when considering whether properties are adjacent, and no longer takes functional relationships into consideration.

3.2 Landfill Regulations Discussion: – All

Lisa Beckman (EPA) offered to put together a document of the elements we are missing in our State methane rule to ensure we meet all the applicable requirements of Subpart Cf - Emission Guidelines and Compliance Times.

3.3 Electronic Permit Submittal Portal: – Sheila Tsai, U.S. EPA

Sheila announced that the EPS portal has been updated to include: 1) a new field to adjust the 45-day review clock to a future date, 2) a public dashboard, and 3) a facilities search option for Districts.

3.4 Other Topics / Updates:

No other updates.

Part 4 – AB 617 Updates

4.1 Databases in Relation to AB CARB Centralized 617 Requirements: - Cassie Lopina, CARB

The Rules database has gone Live. CARB is currently working on a “Next Gen” section to provide information on emerging technologies. They have released a Next-Gen residential backup power tool to address the PSPS issues. CARB is coordinating with EPA to ensure the BACT database and the emissions inventory databases have consistent terminology. CARB is proposing to develop a series of 8 videos to provide basic information to the public on air pollution topics and terminology.

4.2 Criteria Pollutants and Toxic Air Contaminants Reporting Regulation (CTR): John Swanson, CARB

- a. Regulatory Status - CARB is working to provide a list to each District on who is expected to report in 2020. The list will only include facilities subject to greenhouse gas reporting (MRR), and facilities with criteria pollutants greater than 250 TPY. CARB will rely on Districts to provide a list of the elevated toxic facilities to them.
- b. 4th Criteria Development and Timeline – On January 16, 2020, CARB distributed a proposed draft of the CTR revisions to CAPCAO and the District working group. The primary change is the re-instatement of the 4th criteria. The listing of the sectors and chemical thresholds are designed to align with Appendix E of the AB2588 program. CARB will hold 5 public workshops between February 6th and February 20th. No information on the funding or fee mechanism for this 4th criteria could be provided.

4.3 District Progress Report in AB 617 Implementation

- a. Steering Committee Meeting Updates - Bay Area AQMD, San Diego County APCD, Sacramento Metro AQMD and South Coast AQMD each provided status updates on their designated communities and associated steering committees.
- b. BARCT Assessment and Implementation Schedule – The group discussed the different BARCT rules they are working on. The group agreed to remove this line item from future agendas.

Part 5 – District Permitting Topics of Discussion

5.1 PSPS Permitting Guidance Discussion

- a. Observed impacts – CARB received so many Form 4040s that there was not always enough time to file the form and send them to the District. CARB's advisory encourages operators to contact the District and advise them as to where they are located.
- b. Several District's shared their unique PSPS permitting policies. CARB anticipates future legislative action to address the PSPS issues.

5.2 Cannabis Operations Permitting Activities Update

SCAQMD is working on a BACT analysis for butane extraction operations. The extraction operations occur in a closed loop system, and the solvent recovery is estimated to be 95%. SCAQMD is considering designating a 95% solvent recovery rate as BACT for extraction operations.

5.3 Cumulative Health Risk Assessments: – Jim Swaney, SDAPCD

Jim raised the question regarding the feasibility of conducting cumulative HRAs.

5.4 San Joaquin Valley ERC Review:

No update.

5.5 Operational Flexibility / Alternative Operating Scenarios: – Mitch Haimov, SCAQMD

SCAQMD discussed operational flexibility for turbine overalls. District's shared their policies on identical replacement provisions versus subjecting a replacement unit to new BACT standards.

5.6 New BACT Determinations and Unique Permitting Activities: - All

Group discussed NOx LAER for thermal oxidizers, NOx BACT for gas turbines, and ammonia slip BACT for prime engines.

Tuesday, January 28, 2020

Part 6 – AB 617 - District Only

6.1 Criteria Pollutants and Toxic Air Contaminants Reporting Regulation (CTR)

Districts expressed concerns regarding the additional workload with the inclusion of the 4th criteria, and no mechanism to pay to do the work. BAAQMD announced that they are proposing to amend their Fee Regulation to add a new fee to implement the CTR.

6.2 Emission Reporting Uniformity Workgroup Update

- a. Refineries – Barry Young (BAAQMD) mentioned that the draft is expected to be completed very soon, and Nick Maiden (BAAQMD) will be scheduling another meeting.
- b. Power Generation – Barry Young provided the update for Arnaud Marjollet (SJVAPCD). All comments have been reviewed. A meeting is to be scheduled to finalize the document.
- c. Landfills – Jim Swaney (SDAPCD) stated that their report will provide a list all the operations that may be found at a landfill, but the report will only focus on the main activities. Fugitive emissions from haul roads are “routine and predicable” and will be included in the report. Each District can make their own decision as whether or not to include haul road emissions.

Part 7 – Committee Updates and Board Assignments)

- 7.1 Enforcement Managers: – Emmanuel Sanchez, (ICAPDC) mentioned the following topics the group is working on: CARB audits, web-based training, oil & gas and landfill MOUs, PERP confidentiality statements, fleet average reporting due dates, streamlining settlements, and committee goals.
- 7.2 Vapor Recovery Sub-Committee: – Bill Thompson (SCAQMD) provided an update. Issues included a mobile refueler in SMAQMD, overpressure alarms, and a proposed lowering of the spillage emission factor by 50%.
- 7.3 TARMAC: – Tracy Goss (SCAQMD) announced that TARMAC conducted a survey to determine the extent of interest in AERMOD HARP 2 training. The survey demonstrated a need. One thought is to have Lisa Bush and Matt O'Donnell (CARB) train a select few District staff. Those trained staff would then go on to train their own in-house staff.

Part 8 – CAPCOA Engineering and Toxics Symposium

- 8.1 Summary of Participant Feedback:– Mary Giraudo, MBARD

The 2019 presentations were well received. But there were requests for improved audio/visual systems, a paperless meeting, and an organized mixer for the first night. The top two requested 2020 symposium locations were Folsom and Napa.

Mary discussed the need to coordinate with CAPCOA prior to selecting the dates for the Engineering symposium to ensure there are no Enforcement or Planning Symposiums scheduled for the same week.

- 8.2 Discussion on Potential Topics and Future Locations: – All

Potential topics suggested were AB 617 databases, Uniform Emission Reporting, CTR regulation, PSPS, cannabis, and AB-2588 Industry-wide guidelines. With a significant number of proposed topics involving CARB related programs, the group leaned toward having the symposium in Folsom to allow for CARB participation.

Part 9 – 2020 Goals and Areas of Focus

- 9.1 Goal - AB 617 Emissions Reporting Uniformity: The deliverables for the following 3 Sectors are coming soon: Refineries, Power Generation, & Landfills.

- 9.2 Goal - HRA / Air Dispersion Modelling Training: Group is close to a selecting dates for training.
- 9.3 Goal - CAPCOA Website Development Input: Rachael Pallatin (CAPCOA) and Joe Tona (Tehama County APCD) are the contacts for the website development. No updates were available. The group agreed it would be nice if we could put together a wish list. Will request an update from website developers.
- 9.4 Area of Focus - Source Testing Observation Training: A training class has been scheduled for May 6, 2020 in San Diego. The class can accept up to 30 people.
- 9.5 Area of Focus - PSPS Workgroup Deliverable (i.e. guidance document)
- 9.6 Area of Focus – Cannabis Operations Permitting: Districts were requested to update the cannabis spreadsheet, and provide Emmanuel (PCAPCD) with point of contact information.
- 9.7 Other Goals / Areas of Focus: Additional goals and areas of focus proposed for 2020 include:
 - a. Crematories (TARMAC or Engineering goal)
 - b. Pyrolysis
 - b. Composting updates
 - c. AB 617 Emissions Reporting Uniformity – Add oil & gas and non-metallic mineral processing as the next 2 Sectors for development.

Part 10 – Conclusion

- 10.1 Roundtable Discussion: – All
 - a. San Diego APCD - Will be providing options to their Board to lower their cancer burden threshold, currently at 100 in a million.
 - b. South Coast AQMD - Reviewing hexavalent chromium emissions from chromic acid heated tanks.
 - c. Monterey Bay ARD - Submitted a Subpart EEEE Applicability Determination request to EPA for a gasification project.
 - d. EPA – District assigned contacts might be changing. EPA will let us know.

ATTACHEMENTS:

Attachment #1 – Engineering Managers Meeting Minutes – October 7, 2019

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Attachment #2 – Engineering Managers Action Item Tracking – January 2020

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Attachment #3 – Local Districts' Cannabis Interpretation – January 2020

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